



NRDC Comments on the 5/12/04 Proposed Amendments to  
California's Title 20 Appliance Efficiency Standards

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June 14, 2004

The Natural Resources Defense Council (NRDC) is a non-profit environmental advocacy organization with over 550,000 and nearly 120,000 members in the U.S. and California respectively. For the past two decades, NRDC has been an active participant in the CEC's energy efficiency standards and is supportive of the proposed amendments to Title 20 that the CEC outlined in its May 27-28 hearings. Below we respectfully submit a few recommendations on ways to improve/clarify a few sections of the proposed standards.

**1. Refrigerated Beverage Vending Machines**

The CEC's proposed standard contains an equation that sets maximum allowable daily energy consumption (kWh) levels for refrigerated beverage vending machines expressed as a function of machine capacity (number of cans). This equation is identical to the one used in the Energy Star program, which already has very high levels of compliance by the machine manufacturers.

The proposed CEC standard as currently written unfortunately does not contain the other key component of the Energy Star spec that deals with limiting the machine's energy consumption during extended periods when no vending activity is occurring (e.g., 9pm to 7am at a school). As considerable amounts of energy are used to illuminate machines that will not be viewed or to maintain very cold beverage temperatures when no products will be purchased for more than 12 hours in some cases, we respectfully request the CEC to:

- a) Add the low power mode language excerpted from the Energy Star spec .

***Low Power Mode Requirement***

*The machine shall be capable of operating in each of the low power mode states described below:*

- 1. Lighting low power state - lights off for an extended period of time.*

2. *Refrigeration low power state - the average beverage temperature is allowed to rise above 40°F for an extended period of time.*
3. *Whole machine low power state - the lights are off and the refrigeration operates in its low power state.*

*In addition, the machine shall be capable of automatically returning itself back to its normal operating conditions at the conclusion of the inactivity period. The low power mode-related controls/software shall be capable of on-site adjustments by the vending operator or machine owner.*

- b) Require machines to have a backup power source (battery or capacitor) that maintains the control settings in the event of a black out. This is a low-cost method of ensuring that the efficiency settings remain enabled after a black out or other source of power interruption.

As the controls needed for the low power mode feature are relatively inexpensive, we believe every machine installed in CA should have this capability, which for some sites can provide an additional 25% or more additional energy savings, if enabled. Since each site has its own unique operating conditions, we recommend against requiring the machines to be pre-set to certain default factory set conditions.

## **2. External Power Supplies**

Over the past three years NRDC has been at the forefront of advocacy efforts related to reducing the power consumption of consumer and office electronics products that contain an external AC to DC power supply. We strongly support the direction the CEC is taking and the content of its draft standards.

As these standards are intended to cover the manufacture of both external power supplies that are: a) self-standing and sold at an electronics store such as Radio Shack or Circuit City (e.g., replacement power supply sold when consumer loses theirs); and b) included at the time of sale as part of a finished product like a cordless phone, the CEC text must adequately address **both** situations.

To prevent any misunderstandings or future compliance issues, we encourage the CEC to expand the language in section 1605.3 (u) (1) to explicitly state that finished products that contain an external power supply, either hard-wired or detachable, at the time of sale are covered by the Standard levels contained in Table U-1.

We also want to refute incorrect statements that were made regarding the status of a test method for measuring the efficiency of external power supplies. Contrary to comments from AHAM, the test method is essentially complete and reflects several rounds of industry input and feedback. Over the next few weeks, EPA plans to finalize its proposed performance specification for external power supplies and will make any last

minute editorial changes that might be needed to the test method. More information on the test method and its development, including industry comments, can be found at: <http://www.efficientpowersupplies.org/methods.asp>.

### **3. Portable Room Air Cleaners**

In developing their case study, the utility's consultants performed an analysis of model performance (expressed as CADR) vs. retail cost and found there to be no correlation between the two. The manufacturers present at the hearing stated that the more efficient units will cost significantly more, and that the proposed standard should be weakened.

To resolve this matter, we encourage the manufacturers or their trade association to provide supporting data and for the CEC to hold a conference call with interested parties to discuss the data and potential next steps. In the absence of additional data from the manufacturers, we recommend the proposed standard remain unchanged.

### **4. Commercial Refrigeration Compliance Dates**

For several of the commercial refrigeration products, the Air-Conditioning and Refrigeration Institute (ARI) requested a delay in the effective date of the standards until 2010 in order to align with their efforts to transition to more ozone friendly refrigerants by the legal deadline of 2010.

As there are already numerous models on the market today that meet the proposed CEC standards, we do not feel it is necessary or appropriate to delay the effective date of the CEC standards from the proposed dates of 2006 or 2007.

### **5. Digital Converters for Analog Televisions**

NRDC supports the addition of digital converter boxes to the CEC's standards. While this sub-category of products is virtually non-existent today, its sales and use will increase dramatically as the 2007 deadline for digital TV transmission approaches. This will trigger the sales of millions of digital converter boxes to enable existing analog TVs to continue to function beyond 2007.

In order to have maximum impact on the future market of these products, we believe it is important for the CEC to set a standard now for this category. This will serve to notify the designers of these devices of the future power use requirements and provide them with two plus years of lead time to incorporate any needed changes.